

REMARKS

Claims 1-27 are pending. The independent claims are method claim 1 and system claim 15. Independent claims 1 and 15, are rejected as obvious from *Chiang* (U.S. Patent No. 5,535,422) in view of *Mustafa* (U.S. Pub. No. 2002/0059378 A1).

Applicant notes that the filing date of *Mustafa* (August 17, 2001), was after the filing date of the present application (March 27, 2001). However, *Mustafa* claims priority to a provisional application filed August 18, 2000. Therefore, applicant respectfully requests that the U.S. Patent and Trademark Office provide Applicant with a copy of the provisional *Mustafa* application in order that Applicant can study the provisional application and in particular those parts of the provisional application which may support the portions of the non-provisional *Mustafa* application that are now being relied upon by the non-final Official Action.

Applicant also notes that present claim 12, is indicated as rejected on the "Office Action Summary" but is merely objected to in the detailed action. Clarification is respectfully requested.

The Chiang Reference

Paragraph 3, of the non-final Official Action cites column 18, of *Chiang*, lines 65-67. This paragraph of *Chiang* discusses a "show-me" function for tutoring a user in the actual use of software. The show-me function can be requested by a user at three different levels: (1) performing all actions in the lesson, (2) performing all actions for a particular step, or (3) performing the next action when an error is detected. It is this last feature of *Chiang*, which the non-final Official Action is citing against the present independent claims.

The non-final Official Action is contending that, when *Chiang* performs an action, *Chiang* is providing the "customized training resources" of the present independent claims. However, Applicant respectfully submits that it is often difficult to determine what a software user who makes a mistake was trying to do. There is usually no single "next action" which should be taught to a software user. Instead, a user will typically need more comprehensive

training to learn his or her various options regarding how to proceed with the software programming, and this is especially true with respect to the programmable logic controllers (PLC's) of the present independent claims. Therefore, *the applicant respectfully disagrees with the statement in the non-final Official Action that Chiang "would be equally applicable to any software product" (page 3, third full paragraph)*. Actually, *Chiang* is only applicable to linear software algorithms, in which one step follows another without variation; only in such algorithms is there a clear "next action" of the type described at column 18, line 67 of *Chiang*. This is why *Chiang* merely discloses what might be called a "monkey see, monkey do" type of training.

Moreover, according to the cited portion of *Chiang*, the show-me feature will actually perform a step, instead of helping *the user* to perform the step. According to the present invention, the user will do all the programming of the programmable logic controller (PLC). For example, in figure 3 of the present application, the programming input signal 304 emanates from the user and not from anywhere else. The independent claims are now amended to emphasize this important feature of the present invention, and this amendment is also supported at least by page 5 of the application, lines 25-27.

The non-final Official Action acknowledges *Chiang* fails to teach that information about the user's errors/difficulties is communicated automatically over a communications network (see second sentence on page 3 of the non-final Official Action). This is a central feature of the present invention, and claim 1 is also now amended to more particularly point out and describe this central feature. Independent claim 15, already makes clear that the training means and the user device are separated by the communications network, and now claim 1 also makes this feature clearer. This feature is a big advantage of the present claimed invention over *Chiang*, because it allows producers of the computer software to easily monitor the use of their training materials and modify them accordingly (see page 3 of the application, lines 15-18).

Applicant respectfully submits that this feature of present claims 13 and 24, is not disclosed by *Mustafa*, although the non-final Official Action cites the "client profile" of *Mustafa* (second full paragraph on page 3, of the non-final Official Action). Applicant has carefully

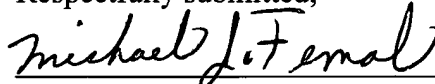
studied *Mustafa*'s discussion of the "client profile" at paragraph 33, of *Mustafa*, and Applicant could not find anything to suggest using the "client profile", modifying the training resources, or to do so, while the software remains unmodified.

CONCLUSION

For the reasons set forth above, it is respectfully requested that the rejections be withdrawn, the application be reconsidered, and the claims be allowed.

Applicant requests that Examiner elicit contact with the Applicant's attorney by telephone, if doing so might facilitate or expedite examination of the present application. It is believed that early passage of the present claims to issuance would be appropriate according to the relevant statutes and regulations, in view of the novel and useful invention claimed by the present application.

Respectfully submitted,



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